

## **Swale Borough Council Local Plan Examination Statement**

### **Matter 4: Other new allocation policies or modifications: New housing allocations AX1-AX7, Modifications to existing allocations, Regeneration policies**

This statement has been produced as part of the examination of the Swale Borough Local Plan: Bearing Fruits 2013 and its Proposed Main Modifications June 2016. It answers the Inspector's questions relating to Matters 4.1-4.7.

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**4. Other new allocation policies or modifications: New housing allocations AX1-AX7 Modifications to existing allocations, Regeneration policies**

1. This statement should be read in conjunction with the Council's responses within SBC/PS/117.

**Matters 4.1-4.5 Is each of the new AX allocations: (see Table 1 in Appendix A)**

2. In order to minimise repetition, the Council has addressed this in Table 1 in Appendix 1.

**Matter 4.6 Are proposed modifications to existing allocations justified and necessary to ensure soundness of the Plan?**

3. Modifications to existing allocations generally comprise the following minor changes:
  - 1) Providing links with infrastructure provision within the IDS (SBC/PS/103).
  - 2) References to open space provision (within supporting text).
  - 3) References to Mineral assessment (see Matter 8).
4. In the case of 1), this strengthens the links between policies and infrastructure and ensures that the IDS is appropriately referred to. They are justified (although not necessary to secure the plan's soundness as there are other policies that could be referred to).
5. In the case of 2), this updating of supporting text reflects the high level calculation derived from the open space standards in Policy DM17. They are justified, but again not for soundness reasons. It remains the case, as reflected in relevant wording in the plan, that the actual open space provision would be determined at the planning application stage.
6. Three existing allocations policies have been subject to more significant modification:
  - 1) Policy MU1: Land at North-west Sittingbourne:
    - i. Some changes reflect general updating and common issues with the new allocation at Iwade, such as strategic greenspace and infrastructure improvements at Grovehurst. These are justified so as to secure greater gains against the NPPF strands of sustainable development.
    - ii. A number of modifications relate to securing the access to the site and its linkages north and south. There will though be a need to take into account the Statement of Common Ground at SBC/PS/121 which will cover the allocations overall relationship with the junctions in the A249 corridor (see Matter 5). To inform the SOCG, further highway assessments have been undertaken jointly between the developers, Highways England, KCC Highways and SBC. At this juncture, it is likely that access to the allocation would be provided at Quinton Road (to the south) and Grovehurst Road (to the north). The development

would therefore be required to ameliorate the potential impacts at the A249 Grovehurst and/or Bobbing junctions. The highway assessment will establish the extent of the works required and determine the balance of access north and south that would be required from the site. In the case of Grovehurst, SBC/PS/121 is likely to confirm the deliverability of an interim scheme to enable the allocation to proceed. The Council will work with the developers to present additional (minor) modifications to both clarify these matters and resolve any outstanding objections. This will also include clarifying the status of the adoption of the proposed Masterplan/development brief.

2) Policy MU5: Land at Lady Dane Farm:

- i. Is able to accommodate a modest further phase of housing within its existing boundaries in the interest of increasing housing provision at Faversham. This can be achieved without compromising the overall objectives of the Policy.

3) Policy A9: Land at Crown Quay Lane Sittingbourne:

- i. This policy was substantially re-drafted as a tabled modification at the first Examination stage, it having been agreed with the previous majority landowner and the Environment Agency. The issues identified by the modification are justified, based on the site constraints and its overall importance to the town. Some are necessary to make the allocation sound and/or to ensure it maximises its contributions to sustainable development.
- ii. The modifications also reflect the need to take a comprehensive approach to development of the site which shall be demonstrated via a masterplan/development brief involving all owners. The new majority owner is taking forward a masterplan via a recently submitted full planning application.
- iii. The majority owner considers that the Local Plan should not prejudice parts of the site from coming forward if, for whatever reason, other parts do not/cannot progress. The Council is unclear as to whether a change is requested here. However, in urban regeneration terms this allocation is one of the most important and the Council will not agree to a dilution of its aspirations for the site or the comprehensiveness of the approach that is required to deliver them. The Council considers that with a proper masterplan in place, development of the site will proceed in an agreed sequence and as such no change to the policy would appear necessary or appropriate.

**Matter 4.7 Are the new regeneration policies Regen 3 and Regen 4 justified and necessary to ensure soundness of the Plan?**

- 7. Both policies are considered justified in the context of the Inspector's interim findings in respect of paragraphs 27-29 of ID/9c. They were drafted during the first

stage of the Examination and agreed by the Port and (the then) KSP owners. They are both judged as meeting the concern of the Inspector in that they are now no longer couched in terms of longer term opportunities and have the ability to positively address development needs within the plan period.

8. There are no particular issues with Policy Regen 3, although a modification has been added to the one previously agreed as a product of the HRA (SBC/PS/104).
9. Policy Regen 4 for Kent Science Park has attracted greater levels of local concern. Despite agreement of the modification with the previous owners, the new owners wish to ensure that the Local Plan signals the necessary infrastructure and full development potential of the site which are likely to be of a much greater scale than could be accommodated by the current wording. As part of this, they seek the re-instatement of references to highway schemes on the M2 previously opposed by Highways England (and the Council) at the earlier Examination. Conversely, local communities see even the modification as currently drafted as going too far, perhaps being used as a stalking horse for a much larger proposal and/or allowing inappropriate or unjustified development.
10. The Council considers Policy Regen 4 to represent an appropriate balance which is both justified and necessary. It is justified because the references sought by the site owners are not currently deliverable or evidenced, particularly that relating to J5a and an A2/M2 link. Although KSP is a strategic employment location, unlike Regen 3, this highway infrastructure and/or any stand-alone residential development could not be accommodated within the current Local Plan settlement strategy. The lead-in time for the evidence required to support it would be so significant that even if the plan were not to commence its review for three years, there would be time for it to be fully considered as a future strategic option as part of that process.
11. Turning to local community concerns, it is difficult to see where the Main Modification has overstepped its mark. It requires proposals to be justified and provides the necessary safeguards to deal with both existing development needs, whether these occur inside or outside the security fence, whilst enabling almost any proposal (short of those needing major infrastructure) likely to be delivered in the next five years or longer to be considered via planning applications, subject to appropriate criteria.

## Appendix 1: Assessment of new AX allocations

Table 1 Assessment of new AX allocations

Allocation	Is each of the new AX allocations:				
	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
AX1 Land west of Barton Hill Drive, Minster	See overall rationale for allocation at SBC/PS/117i Appendix 1. Within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17). Paragraph 5.3.14 identified site as 'stand-out' and 'given' for the purposes of developing alternatives. Also appraised within site options at pages 76-81 with allocation featuring higher in the rough order of preference than other options. Landscape impacts noted, but with substantial mitigation as well as support for transport enhancements. See also Council's reasons for selection of preferred approach at Section 7.2.  Considered by May 2016 LDF Panel	Yes, see Appendix C of SBC/PS/113.	Yes, see IDS (SBC/PS/103).	Yes, see IDS (SBC/PS/103). Awaiting outcome of funding bid for A2500 improvements. Development will provide the land for the junction improvement/roundabout which will be suitable to serve the allocation and wider growth (at least in the medium term – see also Matter 5 statement).  Notwithstanding the current bid for public funding, this site and other Sheppey allocations will contribute toward the	No formal wildlife and biodiversity designations. Protected species and SAMMs addressed by Policy DM28. Net gain in biodiversity sought by Policy AX1. See also landscape (left) which proposes Landscape and Ecological Management Plan.  In respect of heritage, the only issue is the setting to designated heritage asset at Parsonage Farmhouse.

Is each of the new AX allocations:					
Allocation	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	<p>report at SBC/PS/108 paragraphs 3.77-3.90. This concluded that landscape and visual impacts (inc. countryside gap) did not outweigh development benefits, including use of non-BMV.</p> <p>In respect of the Strategic Housing Land Availability Assessment at SBC/PS/037 and 110, this confirmed the site as being overall achievable within its second 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 540 dpa.</p> <p>In respect of landscape and gap issues - Council informed by CD/060d (UELCS), whilst development of concept diagram and policy informed by expert landscape advice leading to substantial mitigation proposed by text and policy, including a landscape strategy and landscape and ecological management</p>			<p>improvement. If the funding bid is successful it will be delivered in the first five years, potentially later if not as it will be fully developer funded. Phase II improvements subject to review and later bid.</p>	<p>This is appropriately flagged by the Policy and concept diagram and impact judged as less than substantial (paragraph 3.86 of SBC/PS/108). Policy requires submission of heritage assessment.</p>

<b>Is each of the new AX allocations:</b>					
<b>Allocation</b>	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	plan. See also comparative landscape analysis at SBC/PS/122 which confirms officer landscape and gap conclusions within SBC/PS/108 at paragraph 3.85 and 3.88. Gap issues also previously considered at LDF Panel on 20/02/14 which confirmed that this was not a significant constraint due to the amount of gap remaining and the lack of prominence of the site in the landscape from other settlements.				
AX2 Land at Belgrave Road, Halfway	See overall rationale for allocation at SBC/PS/117j Appendix 2. Within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17). Paragraph 5.3.14 identified site as 'stand-out' and 'given' for the purposes of developing alternatives. Also within site options at pages 76-81 with allocation featuring the highest in	Yes, see Appendix C of SBC/PS/113.	Yes, see IDS (SBC/PS/103).	Yes, see IDS (SBC/PS/103). No specific improvements identified, but need for TA identified to consider local road issues.	No formal wildlife and biodiversity designations. Protected species and SAMMs addressed by Policy. See also landscape (left) which proposes Landscape and Ecological

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	<p>the rough order of preference. Landscape impacts noted as contained and the site well located. See also Council's reasons for selection of preferred approach at Section 7.2.</p> <p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraphs 3.83-3.84 which concluded that the site's adverse impacts were minimal and that there was a beneficial use of non-BMV.</p> <p>In respect of the Strategic Housing Land Availability Assessment at SBC/PS/037, this confirmed the site as being overall achievable within its second 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 540 dpa.</p> <p>In respect of landscape and gap issues - Council informed by CD/060d (UELCS), with allocation in compliance.</p>				<p>Management Plan.</p> <p>No known heritage issues, but plan policies able to address any issues arising at planning application stage.</p>

<b>Is each of the new AX allocations:</b>					
<b>Allocation</b>	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	Development of concept diagram and policy was informed by expert landscape advice leading to substantial mitigation proposed by text and policy, including a landscape strategy and landscape and ecological management plan. Gap issues also previously considered at LDF Panel on 20/02/14 which confirmed that this was not significant constraint due to the amount of gap remaining and the lack of prominence of the site in the landscape from other settlements.				
AX3 Land north of Graveney Road, Faversham (formally Policy MU4) <sup>1</sup>	'Converted' from a mixed use policy at submission stage to wholly residential. Within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17) and classed as a	Yes, see Appendix C of SBC/PS/113.	Yes, see IDS (SBC/PS/103).	Yes, see IDS (SBC/PS/103). Potential contribution to minor improvements at J7 (subject to TA). TA to consider other local road issues. Shared access use	No formal wildlife and biodiversity designations. Protected species and SAMMs addressed by

<sup>1</sup> Policy previously did not include specific references to residential uses.

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	<p>'stand out site' and a 'given' for the purposes of developing alternatives in paragraph 5.3.10. Appraised as a Main Modification at 9.3.4 – no issues raised.</p> <p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraphs 3.41-3.43. It was considered justified and sound in the context of increasing housing provision at Faversham on one of its few brownfield land opportunities.</p> <p>In respect of the Strategic Housing Land Availability Assessment Addendum at SBC/PS/110, this confirmed the site as being overall achievable within its second 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 540 dpa.</p> <p>There are no adverse landscape or gap issues given the scale of the previous</p>			<p>issues (with Policy A6 employment site) have been raised, but are capable of being addressed at the planning application stage via the detailed design and layout. Alternative second and separate access advocated nearby and further to the east would be less desirable in its location.</p>	<p>Policy.</p> <p>No known heritage issues, but plan policies able to address any issues arising at planning application stage.</p>

Is each of the new AX allocations:					
Allocation	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	<p>industrial buildings and existing urban influences.</p> <p>Not considered by CD/060 because it is an urban site.</p>				
AX4 Land at Preston Fields, Faversham	<p>See overall rationale for allocation at SBC/PS/117k Appendix 3. Also within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17). Classed as a 'stand out' and a 'given' site in paragraph 5.3.10 for the purposes of developing alternatives. Also considered by site options at pages 71-75 with allocation featuring highest in the rough order of preference. Notes heritage concern, but also some support from UELCS (CD/60). See also Council's reasons for selection of preferred approach at Section 7.2.</p>	<p>Yes, see Appendix C of SBC/PS/113.</p>	<p>Yes, see IDS (SBC/PS/103).</p>	<p>Yes, see IDS (SBC/PS/103). Potential contribution to interim improvements at J7 (subject to TA). Other improvements subject to TA to include proposals for improved pedestrian and cyclist connectivity.</p>	<p>No formal wildlife and biodiversity designations. Protected species and SAMMs addressed by Policy. See also left in respect of policy requirement for a landscape and ecological management plan.</p> <p>Identified by Turley heritage work (SBC/PS/010) as being within area of</p>

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	<p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraphs 3.44-3.53. This concluded that the site was relatively well contained visually and that whilst there were landscape and heritage sensitivities, these could be reduced as indicated. The site was found to be accessible to a range of services.</p> <p>In respect of the Strategic Housing Land Availability Assessment Addendum at SBC/PS/110, this confirmed the site as being overall achievable within its third 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 776 dpa.</p> <p>In respect of landscape issues - Council informed by CD/060d (UJELCS), this indicated some development potential, whilst development of concept diagram</p>				<p>contributing highly to heritage/landscape setting. However, mitigation has been proposed by policy, notably the setting back of built development from the conservation area boundary and the retention of key views (informed by landscape advice on concept diagrams and see paragraph. 3.47 of SBC/PS/108 with impact judged as less than substantial). Policy also requires submission of heritage assessment.</p>

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	and policy informed by expert landscape advice leading to substantial mitigation proposed by text and policy, including a landscape strategy and landscape and ecological management plan. No gap issues.				
AX5 Iwade Expansion	See overall rationale for allocation at SBC/PS/117I Appendix 4. Also within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17). Paragraph 5.3.19 noted it as a stand out site, but not as a given for the purposes of the spatial alternatives. Also considered by site options at pages 82-85 with the allocation featuring as the highest in the rough order of preference. Judged as the most logical direction for growth with scope for integration and strategic green infrastructure, but with concerns as to	Yes, see Appendix C of SBC/PS/113. Main issue is relationship with improvements to Grovehurst interchange which is reflected in the phasing. Smaller sites can be developed earlier, with northern site having alternative access to the A249 to the north. Southern site is small scale.	Yes, see IDS (SBC/PS/103). As well as major strategic greenspace, additional facilities for the village will include expansion to health facilities and nursery provision.	Yes, see IDS (SBC/PS/103). Main issue is relationship with improvements to Grovehurst interchange covered by Highways Statement of Common Ground at SBC/PS/121. This is likely to confirm development proceeding on the basis of an interim improvement scheme at Grovehurst, with contributions toward a later more major scheme. This may require some	Policy has acted upon advice of HRA (SBC/PS/103) in respect of SAMMS and SPA issues. Site not formally designated for wildlife and/or biodiversity, but policy includes requirements relating to protected species and UK BAP priority habitats. See also left in respect of policy requirement for

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	<p>adjacent SPA. See also Council's reasons for selection of preferred approach at Section 7.2.</p> <p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraphs 3.156-3.173. Paragraph 3.171 concluded that community and other benefits outweighed the visual and settlement separation impacts associated with development, enabling Iwade to make a major contribution both to green infrastructure in the Borough, as well as boosting provision in the rural area and reducing pressures on BMV land.</p> <p>In respect of the Strategic Housing Land Availability Assessment Addendum at SBC/PS/110, this confirmed the site as being overall achievable within its second and third 'sweeps', i.e. the sites to the east and south were potentially</p>	<p>Phasing of eastern site reflects the need for the Grovehurst improvement to be resolved.</p>		<p>additional (minor) modifications to the text and/or policy.</p>	<p>a landscape and ecological management plan. Net gain for biodiversity also sought by policy.</p> <p>Heritage issues appropriately identified by Policy, in particular setting issues to the designated heritage asset (All Saints Church), including requirement for heritage assessment (inc. for archaeology).</p>

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	<p>required to meet a housing target of 540dpa, whilst the site to the north was potentially being within the pool of sites necessary to the housing target at 776 dpa.</p> <p>In respect of landscape and gap issues - Council informed by CD/060c (UELCS). Allocations made in accordance with its commentary (pages 69 &amp; 75) relating to the directions for growth and in terms of minimising impacts on gap and landscape, particularly in terms of its commentary on the need for an overall landscape strategy for the development to sit within.</p> <p>The development of the concept diagram and policy was informed by expert landscape advice leading to very substantial mitigation proposed by text and policy, including a landscape</p>				

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	<p>strategy and landscape and ecological management plan. Gap issues were also considered by CD/060c and the Council has acted in accordance with this. CD/060 did not consider cumulative issues with sites at Sittingbourne, but this was considered by SBC/PS/108 at 3.163 which did not conclude substantial harm, particularly given the scale of mitigation that could be achieved.</p> <p>One respondent believes a site to the SW of the village should be allocated instead because it does not raise gap issues, however page 72 of CD/060c does not indicate as suitable the same scale of growth as proposed by the omission site (SW/216) and notes that land around School Lane is higher and that any significant extended development would impose on the</p>				

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	rural character of the landscape. This, together with other accessibility issues and the landscape benefits that can be achieved to the east of the village, places this site behind the SBC/PS/105b rough order of preference (page 85).				
AX6 Land north of High Street, Newington	See overall rationale for allocation at SBC/PS/117m Appendix 5. Also within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1 (Table 6.1 page 17). Paragraph 5.3.22 identified site as 'stand-out' and 'given' for purposes of strategic spatial alternatives. Considered by site options at pages 85-88 with the allocation featuring as the highest in the rough order of preference. Judged as seemingly the least constrained of the	Yes, see Appendix C of SBC/PS/113 <sup>2</sup> .	Yes, see IDS (SBC/PS/103).	Yes, see IDS (SBC/PS/103). Contribution (together with other sites) toward improvements at Key Street roundabout. Improvements to pedestrian/cycle connectivity.	No formal wildlife and biodiversity designations. Protected species and SAMMs addressed by Policy. See also left in respect of policy requirement for a landscape and ecological management plan.  Potential impacts on

<sup>2</sup> Hybrid application anticipated as being considered by planning committee in February 2017.

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	<p>site options to the north of the village and well located to the village centre/rail station. Highlighted some uncertainties given proximity to conservation area. See also Council's reasons for selection of preferred approach at Section 7.2.</p> <p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraphs 3.174-3.184. Paragraph 3.182 concluded that the site was well contained visually in the landscape, with other impacts capable of mitigation with potential for significant levels of landscape and open space. Highlighted that compared with sites to the west of the village, the allocation was better connected and integrated to the village and its services.</p> <p>In respect of the Strategic Housing Land</p>				<p>setting to conservation area appropriately highlighted by policy with requirement for heritage assessment. May 2016 LDF Panel report at SBC/PS/108 concluded at paragraph 3.182 that impacts were likely to be less than substantial. This is likely to be confirmed by adjustments being made to detailed layout of current planning application to address issues.</p>

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	<p>Availability Assessment Addendum at SBC/PS/110, this confirmed the site as being overall achievable within its third 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 776 dpa.</p> <p>In respect of landscape issues, Newington was not considered by CD/060. However, the development of the concept diagram and policy was informed by expert landscape advice leading to substantial mitigation proposed by text and policy, including a landscape strategy and landscape and ecological management plan.</p> <p>A landscape assessment has been submitted for the current planning application. This confirms Council's landscape and visual judgements.</p>				

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AX7 Land east of Station Road, Teynham (formally Policy A14 – submission plan allocation)	<p>Allocation already found to be soundly based by interim findings.</p> <p>See overall rationale for allocation at SBC/PS/117n Appendix 6. As an existing allocation this did not form part of the strategic spatial alternatives or the site options within the SA at SBC/PS/105b. Was assessed as MM. Paragraph 9.5.3 and 9.5.6 noted the reduction in dwelling numbers as a potential means to address conservation area matters (NB: from the Council's perspective it was also BAP issues which drove this change). Site already determined as appropriate location by previous assessment work for submission plan.</p> <p>In respect of the Strategic Housing Land Availability Assessment Addendum at SBC/PS/037 and 110, this confirmed the</p>	<p>Yes, see Appendix C of SBC/PS/113. Developer has identified issue with securing the access in the form envisaged by paragraph 6.5.148. There is agreement with Kent Highways for an alternative and this can be addressed within an additional minor modification to the paragraph to provide flexibility for the issue to be examined in detail at the planning application stage. There are no reasons</p>	<p>Yes, see IDS (SBC/PS/103).</p>	<p>Yes, see IDS (SBC/PS/103). Junction improvement to A2 and off-street residents parking.</p>	<p>No formal wildlife and biodiversity designations. Protected species addressed by Policy DM28. Old Orchard is UK BAP priority habitat, identified for retention by Policy via reduction in dwelling numbers (if necessary). See also left in respect of policy requirement for a landscape and ecological management plan.</p> <p>Potential impacts on setting to conservation area appropriately highlighted by policy.</p>

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	<p>site as being overall achievable within its first 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 540 dpa.</p> <p>In respect of landscape issues, Teynham was not considered by CD/060. However, the development of the concept diagram and policy was informed by expert landscape advice leading to substantial mitigation proposed by text and policy, including a landscape strategy and landscape and ecological management plan. The site is very well contained within the landscape due to existing built development and existing vegetation.</p>	currently to assume the site to be undeliverable at the point envisaged by SBC/PS/113. An additional (minor) modification is proposed.			Impacts likely to be less than substantial.
A14: Land at Chequers Road and	Within SA at SBC/PS/105b: Supported by strategic spatial alternative option 1	Yes, see Appendix C of SBC/PS/113. In the case of Elm Lane,	Yes, see IDS (SBC/PS/103).	Yes, see IDS (SBC/PS/103). No issues for Chequers Road. Contribution	No formal wildlife and biodiversity

Allocation	Is each of the new AX allocations:				
	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
Inc. Of Elm Lane, Scocles Road <sup>3</sup> , Minster	<p>(Table 6.1 page 17) with both sites identified as ‘stand out’ and ‘given’ in paragraph 5.2.14 for the purposes of developing alternatives. Also in site options at pages 76-81 with the allocations featuring high in the rough order of preference. Chequers Road highlighted as well related and contained, whilst Elm Lane was judged to be fairly well contained, although traffic would be generated on Scocles Road.</p> <p>Considered by May 2016 LDF Panel report at SBC/PS/108 paragraph 3.178 which concluded that in the case of Chequers Road, the dwellings could be accommodated on a frontage site with minimal harm to the surrounding landscape and without precedence for</p>	<p>the site promotor considers that housing numbers should be higher. The Council’s figure reflects the views of Kent Highways that part of the site may be required for road widening. However, if at the planning application stage this is not shown to be necessary, then the question of higher numbers can be considered at that point.</p>		<p>required addressing A2500 improvements. Respondent’s concerns as to use of Scocles Road and Elm Lane. However, there are no concerns from Kent Highways and mitigation can be provided. Additional (minor) modification required to correct error in Table 6.5.3 to refer to frontage widening of Scocles Road, as opposed to Elm Lane.</p>	<p>designations. Protected species addressed by Policy DM28. Policy A14 seeks net gain in biodiversity. There are no known biodiversity issues, although the character of each site may indicate some interest by virtue that they have not been intensively used for farming for many years.</p> <p>Table 6.5.3 of MM166 highlight the need to retain and enhance existing boundary vegetation and, in the</p>

<sup>3</sup> Subject to current planning application.

Is each of the new AX allocations:					
Allocation	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	<p>further ribbon development on sites which would be more visually exposed. In the case of Elm Lane, it was concluded that (unlike sites to the south and north) its containment by vegetation and the higher ground lying immediately to the south, leads to only moderate visual impact. They were also recommended as a means to increase the use of lower quality agricultural land.</p> <p>In respect of the Strategic Housing Land Availability Assessment Addendum at SBC/PS/110, this confirmed the sites as being overall achievable within its second 'sweep', i.e. as potentially being within the pool of sites necessary to the housing target at 776 dpa.</p> <p>In respect of landscape and gap issues - Council informed by CD/060d (UELCS).</p>				<p>case of Elm Lane site, require the submission of an ecological assessment.</p> <p>No designated heritage issues, although some residents consider Elm Lane to be historic. Lane is not designated as a Rural Lane by policy but clearly is of some local character. Mitigation is proposed to reduce traffic use and retain boundary vegetation.</p>

Is each of the new AX allocations:					
Allocation	Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?	Deliverable within the Plan period?	Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?	Supported by clear and deliverable measures to address transport implications of the proposed development?	Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?
	Sites within study areas 26 and 27 where capacity was considered to be low. Scale of allocated sites reflects this outcome. Table 6.5.3 of MM166 highlight the need to retain and enhance existing boundary vegetation.				